

IRA A. COHEN
ATTORNEY AT LAW
3155 ROUTE 10
SUITE 211
DENVILLE, NEW JERSEY 07834

Tele: 973-328-4900
Fax: 973-328-1510

July 22, 2025

Via Email: chambers of SLM@njb.uscourts.gov

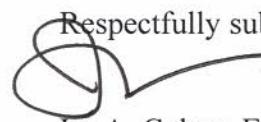
Honorable Stacey L. Meisel, U.S.B.J.
Martin Luther King, Jr. Federal Building
50 Walnut Street, 3rd Floor
Court Room 3A
Newark, New Jersey 07103

RE: Michael J. Arnold - Bankruptcy Case No.: 23-15062-SLM

Dear Judge Meisel:

Please be advised the office of the undersigned represents Debtor, Michael J. Arnold with regard to the above referenced matter. This office was served with a Notice of Motion to Vacate the Automatic Stay as a result of the allegation of the Debtor failing to make payment on a 2018 Toyota Rav4 motor vehicle. Immediately upon receipt of said Motion I contacted my client and ascertained that he had been making all of the required payments and forwarded proof of same to counsel for the creditor a copy of said correspondence is enclosed herewith along with copies of those payments. At that time, I requested that the creditor withdraw their application pending before the Court. Not hearing from counsel, I again forwarded additional correspondence dated June 23, 2025 again respectfully requesting the withdrawal of the Notice of Motion with no reply. I followed up these requests with emails dated July 3, 2025, July 17, 2025 again without response requesting a 30 day adjournment in order to file opposition before the Court.

Respectfully I am requesting that the Court adjourn the matter for 30 days in order to allow the undersigned to file opposition pleadings to oppose the Motion to Vacate the Automatic Stay of creditor's counsel. I apologize for this late hour request however, I have tried every professional courtesy to resolve this matter without success. Most respectfully I would request that an adjournment be granted and that your Chambers notify the undersigned at my email iracohen3155@gmail.com.

Respectfully submitted,

Ira A. Cohen, Esq.

IAC/jv

Enc.

cc.: Michael Arnold (via email)
Larua Egerman, Esq. (NJ_ECF_Notices@mccalla.com)
(laura.egerman@mccalla.com)
Marie Ann Greenberg, Chapter 13 Trustee (magecf@magtrustee.com)
Denise Carlon, Esq. (dcarlon@kmllawgroup.com)

IRA A. COHEN

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Tele: 973-328-4900

Fax: 973-328-1510

June 16, 2025

Via Email: NJ ECF Notices@mccalla.com & Regular Mail

Larua Egerman, Esq.

McCalla Raymer Leibert Peirce, LLP

485 F US Highway 1 S, Suite 300

Iselin, New Jersey 08830

RE: Michael J. Arnold

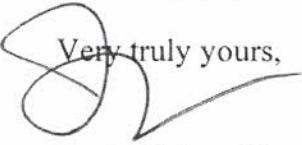
Bankruptcy Case No.: 23-15062-SLM

Dear Ms. Egerman:

Please be advised the undersigned represents Michael Arnold, Debtor with regard to the above matter. I am in receipt of your Notice of Motion to Vacate Automatic Stay as a result of the conception that you have that my client has failed to make payment on a monthly basis to your client, Capital One for the months of March, April and May. I enclose herewith documentary proof from my client's checking account that he paid Capital One Auto the following:

1. March 12, 2025 - \$350.92
2. April 7, 2025 - \$350.92
3. May 7, 2025 - \$350.92
4. June 12, 2025 - \$350.92

Clearly these payments have been made and your clients accounting is less than stellar. Accordingly, I am requesting that you immediately withdraw your Notice of Motion so that my client need not formally file a responsive objection to the Motion as required by the Rules of Court. I would urge that you confer with your client as clearly payments have been made.


Very truly yours,

Ira A. Cohen, Esq.

IAC/jv

Enc.

cc.: Michael Arnold (via email)

Mary Ann Greenberg, Chapter 13 Trustee

<  Need h...  

Sign off

EVERYDAY
CHECKING ...5732

\$949.91

Available balance 

 Search by keyword 

03/12/2025 Balance

5 \$1,468.91

 03/12/2025 \$350.92

CHECK # 8969
(CONVERTED
ACH) CAPITAL
ONE AUTO
CHECK PYMT
250311 8969
49062581001
8969

 03/12/2025 \$37.85

3:01

<  Need h...  

Sign
off

**EVERYDAY
CHECKING ...5732**

\$949.91

Available balance 

 Search by
keyword  Filter

① 04/07/2025 \$350.92

**CHECK # 8972
(CONVERTED
ACH) CAPITAL
ONE AUTO
CHECK PYMT
250404 8972
49062581001
8972**

① 04/07/2025 \$3,232.00

ONLINE 

<  Need h...  6 

Sign
off

EVERYDAY CHECKING ...5732

\$949.91

Available balance ⓘ

 Search by keyword  Filter

5 \$4,272.52

⑤ 05/07/2025 \$350.92

CHECK # 8977
(CONVERTED
ACH) CAPITAL
ONE AUTO
CHECK PYMT
250506 8977
49062581001
8977

<  Need h...   

Transaction details

\$350.92

Transaction: 06/12/2025

Posted: 06/12/2025

Additional info

Category

Car Payments

Transaction description

CHECK # 8978

(CONVERTED ACH)

CAPITAL ONE AUTO CHECK

PYMT 250611 8978

49062581001 # 8978

Ira A. Cohen
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Tele: 973-328-4900
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June 23, 2025

Via Email: NJ ECF Notices@mccalla.com & Regular Mail

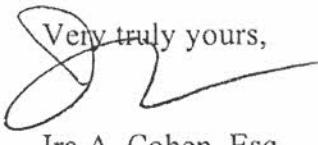
Larua Egerman, Esq.
McCalla Raymer Leibert Peirce, LLP
485 F US Highway 1 S, Suite 300
Iselin, New Jersey 08830

RE: Michael J. Arnold
Bankruptcy Case No.: 23-15062-SLM

Dear Ms. Egerman:

On June 16, 2025 I had occasion to forward to you correspondence, a copy of which is attached hereto, indicating that your client has received each and every monthly payment for the automobile loan that you have filed for vacation of the automatic stay to proceed against the automobile of my client. In light of this showing, will you kindly advise as to whether you have confirmed same with your client and will withdraw the Notice of Motion that you have pending.

If I do not receive your advice with respect to withdrawing the Notice of Motion to vacate the automatic stay, I will have to file opposition to your application which will include a request for counsel fees as a result of the frivolous application of your client due to their inaccurate and/or negligent bookkeeping. I look forward to your most prompt response.


Very truly yours,

Ira A. Cohen, Esq.

IAC/jv

Enc.

cc.: Michael Arnold (via email)